

WARSHAW
BURSTEIN

WARSHAW BURSTEIN, LLP
575 Lexington Avenue
New York, NY 10022
(212) 984-7700
www.wbny.com

February 18, 2025

VIA ECF

The Honorable Philip M. Halpern
United States District Judge
United States District Court for the Southern District of New York
300 Quarropas St.
White Plains, NY 10601

Re: Chun-Ko Chang. v. Shen Yun Performing Arts, Inc., et al., Case No. 24-cv-8980

Dear Judge Halpern:

We are counsel to Defendant International Bank of Chicago (“IBC”) in the above-captioned matter. We write on behalf of the parties in the above matter to jointly request an extension of time for Plaintiff to file an amended complaint from February 19, 2025 to March 5, 2025 and to extend the deadline for all Defendants to respond to the amended complaint to March 31, 2025. Currently, IBC’s deadline to respond to the Complaint is February 19, 2025 [ECF No. 29]. The remaining Defendants (with the exclusion of IBC), have until March 21, 2025 to respond to the Complaint. [ECF No. 56.]

Pursuant to Rule 4(c)(ii) of Your Honor’s Individual Practices in Civil Cases, on February 10, 2025, IBC served Plaintiff with a letter outlining specific pleading deficiencies in the Complaint with controlling authority that IBC contends would warrant dismissal of the Complaint as to IBC. On February 17, 2025, Plaintiff served a responsive letter supporting the Complaint as filed but also stating Plaintiff’s intention to amend the Complaint.

The parties believe that this extension could avoid unnecessary motion practice.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Felicia S. Ennis

Felicia S. Ennis
WARSHAW BURSTEIN, LLP
575 Lexington Avenue, 7th Floor
New York, New York 10022
(212) 984-7700
fennis@wbny.com
Counsel for Defendant

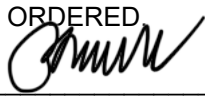
/s/ Adam Farra

Adam Farra
FARRA & WANG
1300 I Street N.W., Suite 400E
Washington, D.C. 20005
(202) 505-5989
afarra@farrawang.com

Application granted.

The Clerk of Court is respectfully directed to terminate the letter motion pending at Doc. 60.

SO ORDERED


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
February 19, 2025

Warshaw Burstein, LLP

International Bank of Chicago

/s/ Steven M. Schneebaum

Steven M. Schneebaum
Steven M. Schneebaum, P.C.
1750 K Street, N.W., Suite 1210
Washington, D.C. 20006
202-742-5900
202-449-3835 (Fax)
sms@smslawdc.com

/s/ Justin Butterfield

Justin Butterfield
Lea E. Patterson
Butterfield & Patterson, PLLC
P.O. Box 941681
Plano, Texas 75094
945-284-0701 (Justin Direct)
945-284-0702 (Lea Direct)
945-523-0171 (Fax)
justin@butterfieldpatterson.com
lea@butterfieldpatterson.com

/s/ Terri E. Marsh

Terri E. Marsh
Human Rights Law Foundation
1701 Rhode Island Avenue NW, Suite 4-117
Washington, D.C. 20036
202-774-0893
terri.marsh.hrlf@gmail.com

Counsel for Defendants Shen Yun

*Performing Arts, Inc., Fei Tian College, Fei
Tian Academy of the Arts, Dragon Springs
Buddhist, Inc., Shujia Gong, Hongzhi Li, and
Rui Li*

Michael C. Dell'Angelo
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
215-875-3080
mdellangelo@bm.net

Mariyam Hussain
BERGER MONTAGUE PC
110 N. Wacker Drive, Suite 2500
Chicago, IL 60606
773-666-4316
mhussain@bm.net
Counsel for Plaintiff